

September 22, 2010

Ms. Mary D. Nichols, Chairperson
California Air Resources Board
P.O. Box 2815
Sacramento, CA 95812

Dear Chairperson Nichols:

RE: San Joaquin Valley Provisional Greenhouse Gas Reduction Targets Pursuant to Senate Bill 375

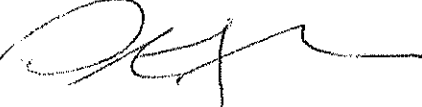
On August 9, 2010, ARB staff released its staff report proposing regional greenhouse gas emission reduction targets for automobiles and light trucks pursuant to Senate Bill 375. Subsequently, the San Joaquin Valley Air Pollution Control District (SJVAPCD) adopted a policy position on the proposed targets for the San Joaquin Valley region.

The Madera County Transportation Commission (MCTC) is in full support of the SJVAPCD recommendation for appropriate placeholder targets in the Valley. The lack of available modeling tools in the San Joaquin Valley and the relatively short timeline for submitting targets to ARB have made it difficult to produce targets that take into account all of the benefits of smart growth planning. Based on the best available model data, provisional Valley-wide targets of 2% for 2020 and 5% for 2035 provide a realistic benchmark for the eight SJV MPOs as we pursue a Model Improvement Plan and reevaluate the targets beginning in 2012.

The Valley-wide targets must also take into account the diversity of the San Joaquin Valley. Much of the Valley is still rural in character and sparsely developed making significant land use and transportation changes difficult. At the same time, the Valley is also home to several large metropolitan areas where smart growth planning and a shift to alternative modes of transportation will result in much greater reductions of greenhouse gas emissions.

MCTC appreciates the openness and flexibility that ARB has shown throughout the target-setting process and looks forward to future collaboration as we prepare to implement SB 375.

Sincerely,



Patricia Taylor, Executive Director
Madera County Transportation Commission